

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA
ALLISON M. JONES
STEVEN M. CHERNOFF

* NOT ADMITTED IN D.C.

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ

OF COUNSEL

JOHN J. MCAVOY
J.K. HAGE III+
LEONARD S. KOLSKY+

TELECOPIER
(202) 857-5747

Email: lngs@fcclaw.com
<http://www.fcclaw.com>

WRITERS DIRECT DIAL

November 20, 2002

RECEIVED

DAL (202) 828-9475
LFR (202) 828-9476

Via Hand Delivery

NOV 20 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attn: Romonda Williams, Telecommunications Access Policy Division,
Wireline Competition Bureau

Re: Supplement to Virginia Cellular, LLC Petition for Designation as an
Eligible Telecommunications Carrier in the State of Virginia
CC Docket No. 96-45

Dear Ms. Dortch:

On behalf of Virginia Cellular, LLC ("Virginia Cellular"), this is in response to the Commission's recent request for additional information relating to the above-referenced petition.

As noted in our supplement filed on October 29, 2002, the square mile and population density data we provided came from the software program Exchange Plus by MapInfo™, which is commonly used in the telecommunications industry. The Exchange Plus software package allows the user to simultaneously query an ILEC's exchange and the Census Bureau's population database to generate information such as population density or the area of a particular exchange or wire center. We believe that MapInfo's database and software package yields the most accurate data available.

We have reviewed VTIA's recent correspondence commenting on Virginia Cellular's data. VTIA's contention that data contained in their letter is available from the census and "can be fully substantiated" does not appear to be accurate. Since the various census boundary

Marlene H. Dortch, Secretary
November 20, 2002
Page 2

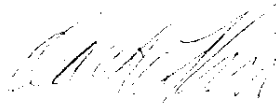
designations do not correspond with telephone company boundary designations, we do not believe it is possible to independently verify VTIA's data by consulting available census data.

VTIA also prefers that the term exchange be used as the defined service area, rather than wire center. Upon review, we understand that rural ILEC exchanges in Virginia contain a single wire center and therefore our use of the term "wire center" is synonymous with "exchange." Should the Commission wish to designate service areas on exchange boundaries rather than wire center boundaries, Virginia Cellular's proposal would not change as a result.

Finally, pursuant to your request, we have enclosed a map showing the NTELOS service area throughout Virginia. **As** you will see, NTELOS operates in one other noncontiguous area in Virginia. That service area is within the Virginia - 5 RSA. The cellular carriers licensed to serve the Virginia -5 RSA are Virginia RSA 5 Limited Partnership (Verizon Wireless) operating on call sign KNK919 and Virginia RSA #4, Inc. (U.S. Cellular) operating on call sign KNKN747.

We hope that this information provides satisfactory responses to your inquiry. Should you have any questions, please call.

Sincerely,



David A. LaFuria
B. Lynn F. Ratnavale
Counsel for Virginia Cellular LLC

cc: Anita Cheng, Esq.
Rose Crellin, Esq.
Highland Telephone Cooperative
New Hope Telephone Company
NTELOS, Inc.
North River Telephone Cooperative
Mountain Grove-Williamsville Telephone Company
Shenandoah Telephone Company
Verizon South Inc.
Verizon Virginia, Inc.
Virginia Corporation Commission

